

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	4:17-CR-00290
	)	4:23-CV-00109
	)	
HARCHARAN SINGH NARANG,	)	
	)	
Defendant.	)	

**MOTION FOR EXTENSION OF TIME TO FILE REPLY**

Dr. HARCHARAN SINGH NARANG, pursuant to the this Court's Scheduling Order (ECF No. 430), respectfully moves this Court for an thirty-two-day extension of time to file his reply to the United States' Opposition to and Request for Denial of 28 U.S.C. § 2255 Motion (ECF No. 436).

**I. Relevant Procedural History**

On January 2, 2023, Dr. Narang filed a Motion to Vacate, Set Aside, or Correct a Sentence by a Person in Federal Custody (ECF No. 427) and a Memorandum in Support of Motion to Vacate, Set Aside, or Correct a Sentence by a Person in Federal Custody (ECF No. 428).

On January 13, 2023, this Court ordered that the Government respond to the aforementioned motion within forty days, and that Dr. Narang file any reply within thirty days from the filing of the Government's response.

(Scheduling Order 1-2, ECF No. 430.)

On February 20, 2023, and March 31, 2023, the Government sought extensions to file its response (ECF Nos. 431 and 434), both of which this Court granted (ECF Nos. 433 and 435).

On April 18, 2023, the Government filed its response (ECF No. 436), thus rendering Dr. Narang's reply due by May 18, 2023.

## **II. Factual Assertions**

Dr. Narang's attorneys, since the Government's having filed its response on April 18, 2023, have been preparing for an oral argument in *United States v. John Gladden, et al.*, No. 21-11621 (11th Cir., docketed May 14, 2021); a motions hearing and trial in *United States v. Kevin Clay*, No. 3:21-CR-00205-JZ-1 (N.D. Ohio., filed Apr. 1, 2021); post-change-of-plea pleadings in *United States v. Kevin Hargrave*, No. 3:22-CR-00113-BJD-JBT-1 (M.D. Fla., filed Sept. 6, 2022); post-conviction motions in *United States v. John Willis Alexander*, No. 1:21-CR-00056-RJJ-1 (W.D. Mich., decided Sept. 14, 2021); and post-conviction motions in *United States v. Sami Anwar*, 4:18-CR-06054-EFS-1 (E.D. Wash., decided Oct. 6, 2020). Although the aforementioned matters are not more important than Dr. Narang's matter, their various, more time-pressing deadlines have caused his attorneys to request this extension for the purpose of their having sufficient time to adequately and fully reply to the Government's response to his original motion.

## **III. Opposing Party's Position**

The Government does not oppose this motion.

#### IV. Conclusion

Dr. Narang, based on the foregoing assertions, prays that this Court grant him a thirty-two-day extension of time in which to reply the Government's response, thereby causing said reply to be due by June 19, 2023.

Date: May 11, 2023

Respectfully Submitted,

*s/ Joshua Sabert Lowther, Esq.*

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2023, I electronically filed the foregoing MOTION FOR EXTENSION OF TIME TO FILE PETITIONER’S REPLY with the Clerk of the United States District Court for the Southern District of Texas by way of the CM/ECF system, which automatically will serve this document on the attorneys of record for the parties in this case by electronic mail.

Date:           May 11, 2023

Respectfully Submitted,

*s/ Joshua Sabert Lowther, Esq.*  
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